



## Staff Register of Interest Policy

David Cameron, Kate Christie 31 July 2023

### Purpose and Scope

1. The Park Authority is committed to meeting the highest possible standards in transparency and accountability. We must be able to cope with public scrutiny of our working practices and ensure that our decision making cannot be called into question as a result of any perceived conflict of interests on the part of staff. This policy applies to all staff employed by the Park Authority and should be read in conjunction with the [Code of Conduct for Employees](#). Board Members' obligations around conflicts of interest are covered in the Code of Conduct for National Park Authority Board Members.
2. The nature of the work carried out by the Park Authority may require staff to:-
  - a) Engage with stakeholders on a regular basis;
  - b) Evaluate contractors and assess bids;
  - c) Be involved in assessing the merits of alternative proposals relating to the Park; and
  - d) Be involved in the development and approval of the Park Authority's policies, strategies and budget allocations.
3. It is possible that in doing so, any personal interests held by staff could be considered, by someone outwith the organisation, to have the potential to impact upon their decision-making. As such it is important that any such interests are recorded to ensure that the decision-making processes of the Park Authority bears up to external scrutiny; senior managers have ready access to information on personal interests of members of staff and can assess any potential conflicts; and staff are protected from allegations of misconduct as a result of their personal interests.

### Staff Register of Interests (SROI) Form

4. In order to maintain an effective Register of Interests, all staff at band C and above, with a relevant interest must declare it and complete a SROI form. Staff at these grades are likely to be involved in the aspects of the Park Authority's work outlined at point 2 above. The form ensures there is a robust audit trail, and therefore is in place to protect both the member of staff and the organisation.
5. As part of the induction process for new staff, they will be asked to read this policy and complete a form if applicable. The data they provide in the form will be uploaded by the HR



team onto the staff member's PeopleHR account. Staff will be able to access their own Register of Interest data on their PeopleHR account. Should their details ever change, they should contact the HR team, who will provide them with a SROI form to update their details. The HR team will then update the SROI details. They will however still hold on to the previous details, as they may be required in relation to historic activities (see para 36 – 37)

6. The up to date SROI forms that staff complete will be saved in a folder that is accessible only to the Senior Management Team (SMT), comprising the Chief Executive, Directors and Heads of Services, and the HR team. This is so that SMT can identify potential conflicts of interest and mitigate them if required. Staff should be aware that personal details, like addresses, and names of partners are not required to be declared.
7. Individuals in senior roles should expect their role to be subject to public scrutiny as these roles require a significant level of personal judgement and individual responsibility. As such the information on the SROI disclosures of the following staff will be made publicly available:
  - a) Chief Executive Officer
  - b) Deputy Chief Executive and Director of Corporate Services
  - c) Director of Nature & Climate Change
  - d) Director of Planning & Place
8. The Park Authority will process all personal information recorded as part of the staff register of interests in compliance with its responsibilities under the General Data Protection Regulations (GDPR) 2018. This means that the HR team will scrutinise each SROI form and if they identify that your form contains any personal or sensitive information, they will check with you that you are content that this information is published in the Register before publication and / or storage in our internal records systems.
9. Staff must be aware that their submission to the Register may be subject to an FOI request, as is the case for any permanent record or item of information held by the Park Authority. In this respect, the Park Authority's stated position is that the content of the Staff Register of Interest is supplied by staff members with the explicit understanding that:
  - a. it forms a part of their staff HR records and as such is to be treated as personal information;
  - b. it may be accessed by the members of staff specified in this policy document only; and
  - c. shall not be distributed more widely without a member of staff's express permission.

On this basis, should the Park Authority receive a FOISA request for this information, the Park Authority will withhold the information and state in its response that the information



held is personal data and is part of the Park Authority's HR records, and therefore its release is exempt through provisions for such personal information, while release would also represent an actionable breach of confidence within the terms of this policy. The terms of this paragraph do not apply to the information supplied by the Executive Management Team and published.

## Maintenance of Staff Register of Interests

10. An annual year end reminder of this policy will be sent to all staff asking for any updates to be recorded on the form and emailed to the HR team, so they can update PeopleHR.
11. Staff should use the form SROI to update their Register entry **as soon as they become aware of a new relevant interest**, or an existing interest is no longer considered to be relevant. All changes should be emailed to the HR team.
12. All staff have an individual responsibility to advise HR of any changes or updates to their Register entry, or to any new interests which would mean that they needed to complete a form for the first time as soon as they become aware of the interest and should not wait for the annual reminder before declaring or updating relevant interests. Staff must have regard to the provisions under the "Conflict of Interest" heading where they discover or identify they may have a relevant personal interest which they have not previously registered while engaged on a piece of work.

## Categories of the Staff Register of Interests

13. There are seven categories of interests within the Register:
  - a) Additional Remuneration.
  - b) Activities or Roles Related to Additional Remuneration.
  - c) Contracts.
  - d) Houses, Land & Buildings.
  - e) Shares & Securities.
  - f) Non-financial interests; and
  - g) Familial interests.
14. Each of these categories is explained in more detail below. In a number of cases, the category will only be relevant depending on the nature of an employee's role within the Park Authority and dependent on the activities that are underway within the Park Authority at any point in time. If there is any doubt as to whether to declare an interest, employees



are advised to discuss the nature of their interest with the Corporate Services Director prior to submitting a SROI form.

15. A register is also kept of gifts and hospitality, which staff should update in accordance with the Gifts and Hospitality Policy.

## Explanation of Categories

### **Additional Remuneration**

16. This is any income earned from employment other than your employment with the Authority. If you are working for a second employer, either employed or in a regular voluntary capacity, or operating your own business, details should be submitted on the form to the HR helpdesk.
17. Examples of roles to declare in this category are:
  - a) Employment with a second employer other than the Park Authority
  - b) Being self-employed, carrying on a trade, profession, vocation, or any other work.
  - c) Being a director, partner of or holding any office within another organisation
18. Any staff involved in secondary employment must be aware that they cannot work more than 48 hours a week on average - normally averaged over 17 weeks. This law is sometimes called the 'working time directive' or 'working time regulations. Further information can be found at: <http://www.hse.gov.uk/contact/fags/workingtimedirective.htm>
19. There are health and welfare considerations that must be taken into account by staff involved in regular employment/self-employed in addition to their role with the Park Authority. Staff engaged in additional employment must take into account the risk of fatigue, stress and potential impact on their ability to perform their role for the Park Authority. This may result in failure to fulfil their responsibilities and lead to disciplinary action.
20. Staff should recognise the importance of having time away from work and accept personal responsibility to look after their own health and wellbeing. Staff are not entitled to undertake secondary employment whilst on sick leave from their position with the Park Authority.
21. Staff must understand the terms of the following relevant Park Authority policies:
  - a) [Capability Procedure](#)
  - b) [Code of Conduct for Employees](#)



- c) [Disciplinary Procedure](#)
- d) [Work Life Balance Policy](#)

### **Activities or Roles Related to Additional Remuneration**

22. This category relates to roles, which may not necessarily involve a salary, for example, where a member of staff is an office-holder, such as the treasurer or secretary of an associated body. This category does not require you to declare an ordinary membership of a professional organisation (e.g. CIPD) or trade union, though you should discuss any potential conflict of interest, should your role with the Park Authority involve work with an external organisation of which you are a member.

### **Contracts**

23. This category is relevant where any business which you are involved with, as declared in the above categories 1 and 2 of the Register of Interests, intends to submit a tender for a contract being procured by the Authority **AND** where you are involved in the procurement process as part of your work with the Park Authority.

24. This category also applies where any business with which you are involved enters into a contract with the Authority. Involvement includes, but is not limited to, being a shareholder, member, director, employee of, or professional adviser to, any such business. If any of these situations arise, you must discuss the potential conflict of interest with your line manager immediately.

### **Houses, Land and Buildings**

25. This category would be relevant where you need the Park Authority's consent to do something affecting your property, or where you apply for a grant for works affecting your property.

26. Staff who have a register of interest which potentially impacts on work they are involved in, should discuss this interest with their line manager to ensure any potential conflict is managed correctly. Advice may also be sought from the Corporate Services Director. Failure to disclose this type of interest leaves the Park Authority open to public criticism.

### **Shares and Securities**

27. This category would be relevant where you hold shares or securities in any going concern which will be impacted by any decision or action of the Authority. E.g. a member of staff may own shares in a hotel company. If the hotel company submits a planning application to the Park Authority, the shares owned by the staff working for the Park Authority should be



declared, particularly if the staff who owns the shares has any involvement in the preparation of information for, or determination of, that planning application.

28. The identification of any such interest and potential conflict with the impartial process of work for a planning application must be discussed with your line manager. Failure to disclose this type of interest leaves the Park Authority open to public criticism.

### **Non-financial Interests**

29. This is an interest which, although not providing a salary, may still be relevant to or have an impact upon the work and operation of the Park Authority – for example, holding office in other public bodies, clubs, societies and organisations, such as voluntary organisations. It is necessary also to declare ordinary membership of a professional organisation.
30. The test to apply when considering whether or not to declare and register a non-financial interest is to ask whether a member of the public, acting reasonably, might consider that your non-financial interest could potentially affect your ability to make an impartial decision in terms of your day-to-day role and responsibilities as an employee of the Park Authority.

### **Familial Interests**

31. This category applies where an interest is held by an employee's family **AND** where that interest would be recorded in terms of this Policy were it held by the employee himself/herself. It is accepted that there may be situations where employees are unaware of interests held by relations; a Register entry should be provided where an employee is aware of or becomes aware of a familial interest. Any such interests which may result in a conflict with your work should be discussed with your line manager immediately.
32. Processing of any personal information about family of employees of the Park Authority will be managed in accordance with the requirements of the [General Data Protection Regulations and Data Protection Act 2018](#)
33. For the purposes of this Category, a person is a member of an employee's "family" if that person is the employee's spouse, partner, civil partner, parent, grandparent, step-parent, child, grandchild, step-child, sibling, uncle, aunt, nephew, niece or cousin.
34. If you require any guidance on the interpretation of any of these categories, please consult the Corporate Services Director before submitting a SROI form to the HR team.

### **Creating or Amending a Register Entry**

35. Staff should create or amend their Register entry where:



- a) A new interest has arisen; and/or
  - b) An existing interest requires to be modified or removed altogether.
36. In either situation, the employee must email a SROI form to the HR team as soon as as they become aware of the interest, and within one month at the latest. Modification or removal of an existing interest will be processed subject to the following caveats:
- a) interests declared under categories (1), (2), (3), (4), (5) and (6) will be removed from the Register three years after the employee submits his/her amendment to the Register.
  - b) When an employee leaves the employment of the Authority, their Register entry shall be retained for a period of three years from their leaving date.

### Conflict of Interest

37. In accordance with the Code of Conduct for Employees and in the event that an employee considers that they might be the subject of a potential conflict of interest (which could include an interest held by a friend or associate), the matter should first be raised with their line manager and may be referred to the Corporate Services Director, who will provide an opinion on whether the employee should be excluded from participating in any decision-making process relevant to the conflict of interest.
38. It is possible that circumstances may arise in any member of staff's work where they recognise, they may have some personal interest which they have not thought to disclose on their register of interest form. Should this situation occur, the member of staff must notify their line manager, the Director of Corporate Services and any project manager leading the work in question immediately. They should not engage further with the item of work concerned until a decision on whether a conflict of interest exists has been provided to them.
39. If any board member, member of staff or member of public has a concern about a potential or perceived staff conflict, they should contact the Corporate Services Director who will investigate the matter and take appropriate action if necessary.

### Incorrect Register Entries

40. It is important that any relevant interests are captured, as a failure to register a relevant interest can have a significant impact on the Authority from a legal and reputational perspective.



41. Although in most cases staff will merely be encouraged to correct any omissions from their Register entry, in more serious cases, where any staff member is found either to have failed to register a relevant interest or to have failed to accurately register a relevant interest, the matter may be dealt with under the Park Authority's Disciplinary Procedure. Depending on the severity of the failure to register an interest, the matter could be considered to be gross misconduct, for which summary dismissal is a potential consideration.
42. If staff are in any doubt over whether to declare an interest, they are encouraged to over-declare rather than under-declare, in the interests of transparency.

### Gifts/Hospitality

43. This policy is related to the Gifts and Hospitality Policy and should be read in conjunction with that policy.

### Review

44. This Policy will be reviewed where a requirement to do so is identified as a result of any defect or deficiency being noted, or where there is a change to relevant legislation or related Park Authority policies.

Version 1.0 approved 30 September 2016

Version 2.0 with amendments to paras 5 and 6 reinforcing public document  
Also, change from Data Protection Act 1998 to GDPR 2018.

Version 3.0 referencing changes to publication, FOISA provisions and differential treatment of Executive Management Team from other staff following Governance Committee Review, August 2023. This version adopted.

 17 August 2023





## Appendix 1

### Form SROI

Please complete and sign this form and email to the HR team. By emailing this form you are confirming your agreement with the declaration below.

Employee Name:	
Job Title:	
Directorate:	

### Declaration

I declare that the information provided below is accurate to the best of my knowledge and belief, that I have provided all information that ought to have been provided and that none of the details set out below are materially false or misleading. I recognise that a failure to declare an interest or the provision of false or misleading information may result in disciplinary action. By completing and returning this form I understand that this information is required in connection with the Authority's obligations to ensure that its actions are transparent and accountable and stand up to scrutiny and I consent to it being held and further used for those purposes.

N.B. if you are removing an interest, please highlight "NO" and provide details, including the date when the interest ceased to be relevant.

ADDITIONAL REMUNERATION	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )



Details:
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ACTIVITIES OR ROLES RELATED TO ADDITIONAL REMUNERATION	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

CONTRACTS	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

HOUSES, LAND AND BUILDINGS	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

SHARES AND SECURITIES	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

NON-FINANCIAL INTERESTS	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

FAMILIAL INTERESTS	
Interests Held:	YES/NO ( <i>delete as appropriate</i> )
Details:	

Signature:

Date: